



Federal Regulatory Affairs

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May 24, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On May 22, 2012, Malena Barzilai, Cesar Caballero and Kerry Smith of Windstream Communications and Rick Burson, Ken Mason, and the undersigned from Frontier Communications met with the following members of the Wireline Competition Bureau: Deena Shetler, Dan Ball, Randy Clarke, Victoria Goldberg, Elizabeth Anderson, Doug Slotten, Belinda Nixon, Athula Gunaratne, and Merry Wulff.

Frontier outlined steps it will take to calculate eligible recovery of revenue reduced by access charge reform. Frontier discussed taking the amount of revenue collected in Fiscal Year 2011 attributable to switched access/reciprocal compensation traffic and removing late payment charges, open disputes, and write-off charges to determine the net collected switched access revenue. The net collected revenue would be divided by the net billed revenue, which is calculated as the amount of billed switched access/reciprocal compensation traffic during the Fiscal Year 2011, minus certain adjustments. That process creates a percentage of collected revenue that would then be applied to the billed revenues during Fiscal Year 2011.

Windstream's methodology to calculate eligible recovery of revenue reduced by access charge reform is a bit different from Frontier's but conceptually yields the same result. This methodology takes switched access billings for Fiscal Year 2011 and removes all disputes/reserves/write-offs for FY 2011 to determine percentage collected. Windstream noted that it would also include backbillings that are related to Fiscal Year 2011 in the switched access billings for FY 2011.

The parties also discussed plans to apply the Access Recovery Charge ("ARC"). Windstream and Frontier are still evaluating opportunities but are planning on calculating ARC eligibility on a wire center basis.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.  
Director of Federal Regulatory Affairs  
Frontier Communications  
(202) 223-6807

cc: Deena Shetler  
Dan Ball  
Randy Clarke  
Victoria Goldberg  
Elizabeth Anderson  
Doug Slotten  
Belinda Nixon  
Athula Gunaratne  
Merry Wulff